



## **HIPAA Notification of Privacy Practices**

**This notice describes how identifiable health information about you and your family member may be gathered, used, disclosed, and accessed as required by the privacy regulations developed pursuant to the Health Insurance Portability and Accountability Act of 1996 – HIPAA- and its update.**

CDI is a non-profit clinical training program for Child Development, Early Intervention, Marriage Family Therapy, Psychology, Speech Therapy, and Occupational Therapy students. As a training institute, many services, including but not limited to evaluations and treatment sessions, are performed by advanced students in training, under the direct supervision of licensed, board-certified therapists. Direct-contact student training and supervision is a required component of all clinical training programs in the various fields listed above.

**OUR PLEDGE TO PROTECT YOUR PRIVACY** The Child Development Institute (CDI) is committed to protecting the privacy of your personal health information (PHI). In conducting business, CDI will create a record of the care and services you receive at CDI. In compliance with Federal and State laws, CDI is required to maintain these records, and ensure their confidentiality. This Notice applies to information and records regarding you and your family's health care and services maintained at CDI.

### **HOW CDI MAY USE AND DISCLOSE PERSONAL HEALTH INFORMATION**

Observation of evaluation or treatment sessions may be conducted by the executive director, department managers, staff, clinical supervisors, and/ or students-in-training as an integral part of our clinical training program.

Observations may be conducted within the treatment space, utilizing one-way mirrors or by videotapes of sessions. Access to the observation areas, and any products of observation, are restricted to those who have been granted clinical privileges by CDI and have agreed to abide by all standing Codes of Ethical Conduct. These codes include, but are not limited to, the Board of Psychology, Board of Behavioral Sciences, Board of Occupational Therapy, Speech-Language Pathology & Audiology & Hearing Aid Dispensers Board, and Physical Therapy Board of California. Staff that violate any standard set forth by the Code of Ethical Conduct are subject to immediate disciplinary action and/ or elimination from the training program.

### **WHO IS REQUIRED TO COMPLY WITH THIS NOTICE**

All employees, volunteers, trainees, students, interns, fellows, contractors, and therapeutic staff members.

Recorded material or personal health information is never used for any marketing or publicity purpose without the explicit and separate permission of those involved.

Although CDI has specific protocols for storage and security of recorded sessions, clients and family members have the right to request that sessions NOT be recorded or observed.

### **USE OF CLIENT'S PERSONAL INFORMATION**

**CDI may use and disclose personal health information (PHI) in the following manner:**

**Treatment.** Diagnostic or evaluation information will be used to plan and implement treatment plans, provide feedback to students, and support ongoing academic training and research in the fields of service of Child Development, Early Intervention, Marriage Family Therapy, Psychology, Speech Therapy, and Occupational Therapy. Treatment information will be used to plan or recommend subsequent treatment or referrals.

**Health Care Operations.** CDI will require all clients to designate the care of PHI at the time of initial service. CDI will request or disclose PHI from or to another provider only with the written permission of the client/ patient or responsible family member. Clients will be asked to sign a written release of information for all PHI going in or out of CDI.

**Payment of Services.** CDI may use or disclose PHI in order to bill or collect payment for services received. This may include communication with a health insurer, a third party payer, responsible family member, or direct patient billing. As Required by Law. CDI may disclose PHI to a health oversight agency or legal firm in response to a health agency request, court order or administrative order for activities authorized by law. Such disclosure activities are conducted under the supervision of CDI's legal counsel.

**Program Quality Assurance.** CDI may use PHI to evaluate the quality of care you are receiving, or to conduct cost-management and business planning activities for CDI.

**Psychotherapy Notes.** Psychotherapy notes means notes recorded (in any medium) by a health care provider who is a mental health professional documenting or analyzing the contents of conversations during a private counseling session or a group, joint, or family counseling session and that are separated from the rest of the individual's medical record. Psychotherapy notes excludes monitoring, counseling session, start and stop times, the modalities and frequencies of treatment furnished, results of clinical tests, and any summary of the following items: diagnosis, functional status, the treatment plan, symptoms, prognosis, and progress to date.

**Psychotherapy notes may not be disclosed without your authorization except in certain limited circumstances:**

- Use or disclosure in supervised mental health training programs for students, trainees, or practitioners;
- Use or disclosure by the covered entity to defend a legal action or other proceeding brought by the individual;
- A use or disclosure that is required by law
- A use or disclosure that is permitted for legal and clinical oversight of the psychotherapist who made the notes or to prevent or lessen a serious and imminent threat to the health or safety of the public.

## **YOUR RIGHTS REGARDING PERSONAL HEALTH INFORMATION ABOUT YOU AND/OR YOUR FAMILY**

CDI has a professional obligation to protect PHI. CDI is committed to safeguarding the PHI of all clients in the following manner:

- a. CDI will provide clients with additional copies of this notice at any time.
- b. CDI is required to maintain records for services and billing for those services in accordance with current federal, state, and PHI laws.
- c. CDI reserves the right to revise or amend its notice of privacy practices. Revisions will be posted, and will take effect for all PHI held by CDI.

You have the right to request that we discuss PHI in a particular location or manner. Clients have the right to designate another responsible person to discuss PHI with us. Such requests should be made in writing to CDI.

You have the right to request a restriction or limitation of use or disclosure of PHI at any time. Such requests should be made in writing to CDI.

You have the right to revoke authorization for uses and disclosure of PHI at any time by providing such a request in writing to CDI.

You have the right to request that an evaluation or treatment session not be observed or recorded.

You have the right to inspect and obtain a copy of their PHI, including reports and billing information, in the presence of a licensed faculty member or supervisor. Such a request should be made in writing to CDI. There is a nominal charge for labor, copying, mailing, etc.